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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SALVADOR MARTINEZ, in behalf of  
himself and all others similarly situated,

Plaintiff,

v.

LINKUS ENTERPRISES LLC; DOES 1  
through 50; inclusive,

Defendants.

CASE NO.: 2:21-cv-01119-RFB-EJY

**STIPULATION AND ORDER TO EXTEND  
TIME TO RESPOND TO PLAINTIFF'S  
AMENDED COMPLAINT (ECF No. 12)**

**(Fourth Request)**

Defendant LinkUs Enterprises LLC ("Defendant") and Plaintiff Salvador Martinez ("Plaintiff"), by and through their respective counsel of record, hereby stipulate to extending the time for Defendant to respond to Plaintiff's Amended Complaint (currently due August 30, 2021) up to and including September 27, 2021. ECF No. 12.

The parties are continuing to engage in discussion regarding potential resolution. The parties have exchanged and reviewed documents related to Plaintiff's claims. This process has been delayed, in part, due to the emergency situation caused by the wildfire in the Lake Tahoe Nevada area where Plaintiff's counsel resides, which has necessitated that he and his family evacuate the area. To allow the necessary time for the parties to work together in good faith to explore the possibility of potential resolution, the parties hereby agree that Defendant's response to the Amended Complaint shall be due on or before September 27, 2021.

This is the fourth request for an extension of time to file a responsive pleading to the Amended Complaint. This request is not sought for any improper purpose or other reason of delay.

Dated this 27<sup>th</sup> day of August, 2021.

McDONALD CARANO LLP

THIERMAN BUCK LLP

By: /s/ Daniel I. Aquino

By: /s/ Joshua D. Buck

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**IT IS SO ORDERED.**

August 30, 2021

Date

  
UNITED STATES MAGISTRATE JUDGE